

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**THE UNITED STATES**

**V.**

**ROBERTO OMAR VERA (01)**

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**CAUSE NO. 3:17-CR-00017-B**

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO  
PRESENTENCE INVESTIGATION REPORT AND CONTINUANCE OF SENTENCING  
DATE**

**TO THE HONORABLE JUDGE OF SAID COURT:**

NOW COMES the Defendant, ROBERTO OMAR VERA, by and through his attorney of record, JAMES LEE BRIGHT, respectfully moves this Court to grant an extension of time in which to file objections to the Pre-Sentence Report and a continuance of the sentencing date. An extension of three weeks is requested to provide adequate and comprehensive response to each objection Defendant has to the Pre-Sentence Report. Defendant's attorney requests this time due to the fact he has been out of the office for an extended period with the flu and has not been able to adequately research and prepare his objections in this cause. As well, the objections deadline falls on March 14, 2019. Defendant's attorney has four children who will be out of school during the week objections are due, during which time the family will be out of town on a pre-planned trip. Due to the extension sought in the deadline to file objections to the Pre-Sentence Report, Defendant's attorney also requests an extension of the April 11, 2019 sentencing date.

Accordingly and for the foregoing reasons, Defendant respectfully requests that this Motion for Extension of Time to File Objections to the Pre-Sentence Investigation Report and Continuance of Sentencing Date be granted.

Respectfully submitted,



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James Lee Bright  
Attorney for ROBERTO OMAR VERA

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**CERTIFICATE OF SERVICE**

This is to certify that on March 7, 2019, a true and correct copy of the above and foregoing document was served on the United States District Attorney's Office, *via electronic submission*.



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James Lee Bright  
Attorney for ROBERTO OMAR VERA

**CERTIFICATE OF CONFERENCE**

On March 7, 2019, I certify that I conferred with Assistant United States Attorney, P.J. Meitl, about the merits of this Motion received his assurances that he is unopposed to the delay sought by this motion..

SIGNED this 7th day of March, 2019.



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James Lee Bright  
Attorney for ROBERTO OMAR VERA